

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE ALTA MESA RESOURCES, INC.
SECURITIES LITIGATION

Case No. 4:19-cv-00957

**CLASS PLAINTIFFS' UNOPPOSED MOTION TO SEAL THEIR (1) MOTION
FOR SEPARATE TRIALS AND ACCOMPANYING DECLARATION AND
EXHIBITS, (2) REPLY IN FURTHER SUPPORT OF MOTION TO STRIKE THE
KPMG MEMO, AND (3) DECLARATION OF ANDREW J. ENTWISTLE
AND ACCOMPANYING EXHIBITS**

Class Plaintiffs in the above-captioned action respectfully request leave to file under seal unredacted copies of their (1) Motion for Separate Trials of the Class Action and the Individual Actions Pursuant to Fed. R. Civ. P. 42(b) and accompanying declaration and exhibits (Dkt. 659), (2) Reply in Further Support of Motion to Strike the KPMG Memo (Dkt. 663), and (3) Declaration of Andrew J. Entwistle and accompanying exhibits (Dkt. 661) (collectively, the “February Confidential Filings”).

As grounds for this motion, Class Plaintiffs state as follows:

1. On August 17, 2021, the Court entered the Stipulation and Protective Order (“PO”), which governs the handling of confidential information exchanged in discovery in this matter.
2. According to Paragraph 24 of the PO, “[i]f any party submits Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material to the Court, the submission **must** be filed only under seal on CM/ECF if filed electronically[.]” PO at

¶ 24 (emphasis added).

3. Class Plaintiffs' February Confidential Filings contain, describe and refer to non-public documents and information that have been designated by the parties and nonparties as Confidential Discovery Material pursuant to the PO.

4. On February 14, 2024 and February 16, 2024, Class Plaintiffs filed the February Confidential Filings under seal. Class Plaintiffs will file public, redacted versions of these filings no later than March 1, 2024. In the interim, Class Plaintiffs will confer with the parties whose Confidential information is contained in the February Confidential Filings to determine which portions must remain under seal.

5. Class Plaintiffs are bound by the provisions of the agreed-upon PO that this Court ordered on August 17, 2021, and therefore must seek leave to file their February Confidential Filings under seal.

THEREFORE, Class Plaintiffs request that the Court grant their request for leave to file under seal unredacted copies of their February Confidential Filings.

Dated: February 16, 2024

Respectfully submitted,

/s/ Andrew J. Entwistle

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CERTIFICATE OF SERVICE

I certify that this motion has been served on counsel of record via the Court's ECF system on February 16, 2024.

/s/ Andrew J. Entwistle
Andrew J. Entwistle

CERTIFICATE OF CONFERENCE

I certify that, on February 15, 2024, counsel for Class Plaintiffs conferred by e-mail with counsel for all parties regarding the substance of this motion. No parties opposed or objected.

/s/ Andrew J. Entwistle
Andrew J. Entwistle